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July 9, 2008

BY HAND

Honorable Deborah A. Batts
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: Kramer v. Lockwood Pension Services, Inc., et al.
08-CV-2429 (DAB) (MHD)

Dear Judge Batts:

We represent the plaintiff and third-party defendants Andrew Kramer and Liza Kramer in the above-entitled matter. Pursuant to Rule I(E) of Your Honor's Individual Practices, plaintiff and third-party defendants hereby respectfully request that their time to respond to defendant Life Products Clearing, LLC's ("LPC") Counterclaims and LPC's Third-Party Complaint, both dated June 20, 2008, be extended up to and including August 1, 2008. Currently, plaintiff's response is due on July 14, 2008; third-party defendant Andrew Kramer's response is due on July 10, 2008; and third-party defendant Liza Kramer's response is due on July 15, 2008. No previous requests for an extension have been made, and counsel for defendant LPC has consented to the requested extension.

In accordance with Your Honor's Order of June 16, 2008 (the "Order"), we consulted with other parties and were informed that defendant Lincoln Life & Annuity Co. of New York ("Lincoln") is requesting that its time to respond to LPC's Cross-Claims, dated June 20, 2008, be extended up to and including August 1, 2008. We understand that Lincoln's response is currently due on July 14, 2008. We have been informed that Lincoln has not made any previous requests for an extension, and that counsel for defendant LPC has consented to this requested extension as well. Pursuant to the Order, please consider this letter to cover both our request and Lincoln's.

SO ORDERED
Deborah A. Batts

DEBORAH A. BATTES
UNITED STATES DISTRICT JUDGE

July 10, 2008